



department of water, air and waste management

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File Name

Maytag HW file HS

Senders Initials

SNR

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August 20, 1984

Mr. Terrance G. Townsend  
The Maytag Company  
403 W. 4th St.  
Newton, IA 50208

RE: Maytag Co. Plant 2  
EPA ID No. IAD005285689

Dear Mr. Townsend:

This is in response to your August 8, 1984 letter and attached closure plan. In general a closure plan for an incinerator includes facility conditions, inventory removal, facility decontamination, air quality monitoring, and closure certification. Air quality monitoring will not apply to your facility as it has been partially dismantled and is not functional. However, the other do apply. Comments relative to the individual areas are:

Facility Conditions

- 1) The closure plan must include the size of the incinerator, the emission control units, the ash containing units, etc.
- 2) A description of the facilities pre-incineration storage units and other storage areas must be submitted.
- 3) The waste characterization must be completed for reach waste in inventory or that has been incinerated. Include the chemical composition, physical state, and quantity that had been burned, maximum quantity on hand at any one-time, and currently, on hand.

Waste Inventory Removal

- 1) The identity of the offsite facility that is to receive wastes that currently remains at the site.
- 2) The quantity of wastes to be disposed as the current operation is closed.



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### Decontaminating the facility

- 1) The plan must include sampling points to document decontamination of the equipment as well as the site. To be addressed are soil samples, ash samples, tank content samples, piping and equipments samples, etc. The points to be addressed need only include equipments that will be salvaged. Contaminated equipments to be disposed as hazardous waste need not be decontaminated.
- 3) The soil samples or other surface samples must be itemized as to the sampling procedure, and the depth and the location at which the samples will be taken.
- 4) The plan must address criteria to be used to document decontamination as well as rationale for the criteria.
- 5) The plan must address the decontamination level to be achieved, ie. decontamination to background or another level. The less stringent level must be justified by literature studies or other information sources.
- 6) The plan must specify the procedures that will be enacted to decontaminate the equipments used during the closure procedure.

### Closure Certification

- 1) The plan must specify the milestones of the closure procedure at which the certifying engineer will inspect the site. This agency must be notified of the dates when each engineering inspection occurs.
- 2) The plan must indicate that closure will be certified by the owner as well as the independent registered professional engineer holding registration in Iowa.
- 3) A special closure schedule must be submitted including a final closure date. The closure schedule must include:
  - a) date closure is expected to begin;
  - b) total time required to close;
  - c) time required to remove the wastes;
  - d) time required to perform decontamination steps;
  - e) time required to evaluate additional decontamination measures;
  - f) time required to do sampling decontamination documentation;
  - g) time required to submit the closure certification
- 4) The cost of each closure activity/procedure must be itemized.

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The Department recommends that the facility bring an independent registered professional engineer on-site for partial closure. This avoids the problem during final closure of expecting a professional engineer to certify closure of portions of the facility which were closed in the past.

The closure requirements state that a facility must keep a copy of the closure plan (the original plan) and all revisions to the plan until closure is completed and certified. Paragraph 265.112(b) requires the owner/operator to amend the closure plan whenever changes in operating plans and facility design affects the closure plan. This would include all partial closure. The facility's original closure plan still must include the old area and how it was closed to the closure performance standards.

If you have any questions on the above, please contact Gene Evans of my staff.

Sincerely,

PROGRAM OPERATIONS DIVISION

Robert E. Campbell, P.E.  
Chief, Air & Waste Permits Branch

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Enclosure

cc: Lyn Harrington, EPA Region VII - Kansas City, MO  
Region 5